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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA
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14 **ARNOLD ABRERA,**

15 Plaintiff,

16 v.

17 **GAVIN NEWSOM, in his official capacity**
18 **as Governor of the State of California; et al.**

19 Defendants.

Case No.: 2:22-cv-01162-DAD-DB

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
SECOND AMENDED COMPLAINT**

**[Fed. R. Civ. P., Rule 6(b);
E.D. Cal. Civil Local Rules 143, 144(b)]**

Judge: Honorable Dale A. Drozd
Trial Date: None Set
20 Action Filed: July 5, 2022

21 **STIPULATION**

22 Per Rule 6(b) of the Federal Rules of Civil Procedure and Civil Local Rules 143 and
23 144(b), Defendants Governor Gavin Newsom, Attorney General Rob Bonta, County of
24 Sacramento, Anne Marie Schubert, City of Elk Grove, Bobby Davis, and Jonathan P. Hobbs, and
25 Plaintiff Arnold Abrera, stipulate to extend the Defendants' deadline to file a responsive pleading
26 to Plaintiff's Second Amended Complaint (ECF No. 77) to March 11, 2024.
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1 The requested extension is 7 days after the Defendants' present responsive pleading
2 deadline, and therefore is permitted under Rule 6(b) of the Federal Rules of Civil Procedure and
3 Civil Local Rules 143 and 144(b). Plaintiff's counsel consents to this extension of time.

4 This is the third extension of time sought with respect to the Defendants' responses to a
5 pleading in this matter, and the extension will not affect the date of any event or other deadline
6 already fixed by the Court.

7 The parties further stipulate that this extension is neither intended nor will be construed as a
8 waiver of any objection or defense that the Defendants may have or could assert against the
9 Second Amended Complaint.

10 **IT IS SO STIPULATED.**

11 Dated: February 28, 2024

Respectfully submitted,

12 ROB BONTA
13 Attorney General of California
14 ANYA M. BINSACCA
Supervising Deputy Attorney General

15 /s/ Jay C. Russell
16 JAY C. RUSSELL
17 Deputy Attorney General
18 *Attorneys for Defendants Gavin Newsom, in*
19 *his official capacity as Governor of*
California, and Rob Bonta, in his official
capacity as Attorney General of California

20 Dated: February 28, 2024

Respectfully submitted,

21 PORTER SCOTT

22 /s/ John R. Whitefleet
23 JOHN R. WHITEFLEET, ESQ.
24 *Attorneys for Defendants County of*
25 *Sacramento, and Anne Marie Schubert, in*
26 *her official capacity as County of*
27 *Sacramento District Attorney*

1 Dated: February 28, 2024

Respectfully submitted,

2 KRONICK, MOSCOVITZ, TIEDEMANN &
3 GIRARD

4 /s/ Alec D. Tyra

Alec D. Tyra, Esq.

5 *Attorneys for Defendants City of Elk Grove,*
6 *Bobby Davis, in his official capacity as Chief*
7 *of the Elk Grove Police Department, and*
8 *Jonathan P. Hobbs, in his official*
9 *capacity as the City Attorney for the City of*
10 *Elk Grove*

11 Dated: February 28, 2024

Respectfully submitted,

12 VETERANS LAW CENTER
13 STRATEGIC LAW COMMAND

14 /s/ Gary W. Gorski

GARY W. GORSKI, ESQ.

DANIEL M. KARALASH, ESQ.

15 *Attorneys for Plaintiff Arnold Abrera*

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18 **[PROPOSED] ORDER**

19 Under the above Stipulation, the time for Defendants to respond to the First Amended
20 Complaint is extended to March 11, 2024.

21 **IT IS SO ORDERED.**

22 Hon. Dale A. Drozd

23 United States District Court Judge

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CERTIFICATE OF SERVICE

Case Name: *Abrera, Arnold v. Gavin
Newsom, et al.*

Case No. 2:22-cv-01162-JAM-DB

I hereby certify that on February 29, 2024, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

- **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO SECOND AMENDED COMPLAINT**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on February 29, 2024, at San Francisco, California.

M. Mendiola
Declarant

M. Mendiola
Signature